

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARISSA CHAMURAS, ON BEHALF OF
HERSELF AND ALL OTHERS SIMILARLY
SITUATED,**

Plaintiffs

V.

**PAUL R. OBER & ASSOCIATES and
PAUL R. OBER,**

Defendants

Civil Action No.: 5:13-cv-07634
Honorable James Knoll Gardner

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS

The Plaintiff Charissa Chamuras (“Plaintiff”), by and through her counsel, petitions this Court pursuant to Fed. R. Civ. P. 68 and to 29 U.S.C. § 216(b) for her reasonable attorneys’ fees and costs incurred in this case. In support of this petition, Plaintiff states as follows:

1. On February 4, 2014, Plaintiff filed a Notice of Acceptance with Offer of Judgment. See Docket Entry 5.
2. Defendants' Offer provides, in relevant part that Defendants agree to Entry of Judgment against them as follows:
 - a. Judgment in favor of Named Plaintiff against Defendants on Named Plaintiff's Complaint and all causes of action alleged therein in the total sum of Six Thousand dollars (\$6,000), *exclusive of attorneys' fees and costs accrued to date which the Court may determine.* (italics added). See Docket Entry 5.
3. Despite the best efforts of the parties, there has been no resolution as to the amount of attorneys' fees Plaintiff's counsel shall be paid.
4. Plaintiff is entitled to reasonable attorney's fees pursuant to the wording of the Rule 68 Offer of Judgment and under 29 U.S.C. § 216(b).

5. Plaintiff submits the following in support of her motion:
- Exhibit A:** Plaintiff's Summary of Fees and Costs;
 - Exhibit B:** Attorney and Paralegal Hours Not Charged;
 - Exhibit C:** Plaintiff's Hours Sorted by Attorney/ Paralegal;
 - Exhibit D:** Plaintiff's Hours by Date;
 - Exhibit E:** Plaintiff's Costs;
 - Exhibit F:** Affidavit of attorney Joshua P. Rubinsky;
 - Exhibit G:** Affidavit of attorney Amy E. Galer;
 - Exhibit H:** Affidavit of attorney Brian Dilks-Brotman
 - Exhibit I.1:** Fee schedule for Philadelphia area attorneys prepared by Community Legal Services of Philadelphia, Inc.;
 - Exhibit I.2:** "The Survey of Law Firm Economics, 2010 Edition, Metropolitan Area Report for Philadelphia-Camden-Wilmington", ALM Legal Intelligence, 2010; And
 - Exhibit J:** Affidavit of attorney Alice W. Ballard, attesting to the reasonability of attorneys' fees and costs requested.
6. This motion is also accompanied by Plaintiff's Memorandum in Support of her Petition for Attorneys' Fees.

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. Award Plaintiff her reasonable Attorneys' Fees and Costs incurred in this case, in the amount of \$13,170.03;
- b. Enter Judgment accordingly; and
- c. Grant such other relief as may be just and proper.

Respectfully Submitted,

BRODIE & RUBINSKY, P.C.

By: 

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DATED: February 25, 2014